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IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JANE DOE I; JANE DOE II; LAKSHMI
and JARMANTI PRATTIPATI as Parents
and Successors in Interest of CHANTI
JYOTSNA DEVI PRATTIPATTI; JANE
DOE III; JANE DOE IV; JANE DOE V;
DANE DOE VI; JANE DOE VII; JANE
DOE VIII; SREEKANTH KOLLIPARA;
and All Others Similarly Situated

Plaintiffs,

vs.

LAKIREDDY BALI REDDY, an
individual; VIJAY KUMAR
LAKIREDDY, an individual; PRASAD
LAKIREDDY, an individual;
JAYAPRAKASH REDDY LAKIREDDY,
an individual; VENKATESWARA
REDDY LAKIREDDY, an individual; and
the businesses they controlled and/or
operated, including PASAND MADRAS
CUISINE, a California corporation;
PASAND, INC., a California corporation;
LAKIREDDY INVESTMENT CO., a
California limited liability corporation; L.B.
REDDY ESTATE CO., a California limited
liability company; JAY CONSTRUCTION,
a California sole proprietorship; ACTIVE
TECH SOLUTIONS, a California
corporation; VANI COMPUTER
SOLUTIONS, a California limited liability
corporation; LAKIREDDY BALI REDDY
d/b/a REDDY REALTY CO., a California
sole proprietorship; and ROES 1 through
100, inclusive,

Defendants.

Case No. C-02-5570-WHA

**RESPONSES TO PLAINTIFF JANE DOE
I'S INTERROGATORIES TO PASAND
MADRAS CUISINE, SET ONE**

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1 PROPOUNDING PARTY: PLAINTIFF JANE DOE I

2 RESPONDING PARTY: PASAND MADRAS CUISINE

3 SET NUMBER: ONE

4
5 INTERROGATORIES

6 1. State YOUR full name and the address of YOUR principal place of business.

7 **RESPONSE:** Pasand Madras Cuisine, located at 2286 Shattuck Ave. Berkeley, CA.

8
9 2. State all other names that YOU have used (including fictitious business names)
10 between January 1, 1982 and the present.

11 **RESPONSE:** None

12
13 3. State YOUR legal status (i.e. corporation, partnership, joint venture,
14 unincorporated association, etc.) and the place and date YOU were formed.

15 **RESPONSE:** Pasand is a partnership formed at 2286 Shattuck Ave. Berkeley, California in the
16 eighties.

17
18 4. IDENTIFY every person and ENTITY that has an ownership interest in YOU
19 and state the size of that interest (i.e. 100 percent, 25 percent, etc.) (If there have been any
20 changes in ownership since January 1, 1990, describe each change in ownership.)

21 **RESPONSE:** Lakireddy Bali Reddy, Jayaprakash Reddy Lakireddy, Vijay Kumar Lakireddy,
22 Prasad Lakireddy

23
24 5. IDENTIFY YOUR officers and directors.

25 **RESPONSE:** None

26
27 6. IDENTIFY YOUR ORGANIZATIONAL DOCUMENTS.

28 **RESPONSE:** Partnership agreement

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1 7. IDENTIFY every ENTITY in which you held, directly or indirectly, a 10 percent
2 or greater ownership interest at any time between January 1, 1990 and the present.

3 **RESPONSE:** None
4

5 8. Did YOU ever EMPLOY any of the PLAINTIFFS to perform work in
6 California?

7 **RESPONSE:** Yes
8

9 9. If YOUR answer to Interrogatory No.8 is yes, list the PLAINTIFFS whom you
10 EMPLOYED to perform work in California and provide their respective dates of
11 EMPLOYMENT.

12 **RESPONSE:** See response to interrogatory 16.
13

14 10. For each of the PLAINTIFFS listed in response to Interrogatory No.9,
15 IDENTIFY all DOCUMENTS that report the number of hours worked by the PLAINTIFF as
16 YOUR EMPLOYEE in California and/or the WAGES paid to PLAINTIFF for such work.

17 **RESPONSE:** Pasand has ledgers and financial records that will be produced at the time of the
18 first document production.
19

20 11. For each of the PLAINTIFFS listed in response to Interrogatory No.9, state
21 whether YOU ever EMPLOYED the PLAINTIFF to perform work in California OFF THE
22 BOOKS.

23 **RESPONSE:** Pasand is unable to answer this question without information from owners who
24 have plead the Fifth Amendment upon advice from their counsel.
25

26 12. For each of the PLAINTIFFS listed in response to Interrogatory No.9, provide a
27 complete itemization of all money and other things of value that were provided to the
28 PLAINTIFF (or his or her family) as full or partial compensation for the PLAINTIFF'S labor as

1 YOUR employee in California and that are not reported in the records YOU identified in
2 response to Interrogatory No.10.

3 **RESPONSE:** Plaintiffs were provided with apartments, food and clothing.
4

5 13. For each of the PLAINTIFFS listed in response to Interrogatory No. 9, provide a
6 complete listing of the hours worked by the PLAINTIFF as YOUR employee in California that
7 are not reported in the records YOU identified in response to Interrogatory No.10.

8 **RESPONSE:** Pasand is unable to answer this question without information from owners who
9 have plead the Fifth Amendment upon advice from their counsel.
10

11 14. IDENTIFY every person (other than the PLAINTIFFS) whom YOU
12 EMPLOYED to perform work in California at any time between January 1, 1990 and the
13 present and provide their respective dates of EMPLOYMENT.

14 **RESPONSE:** Pasand objects to this question as overbroad and unduly burdensome as it requires
15 Pasand to review voluminous records. The records are such answer to this question can be
16 retrieved in a manner that is substantially the same to both parties. Pasand will allow plaintiffs to
17 examine whatever documents Pasand has the may reference the names of employees instead of
18 providing a substantive response to the question as allowed by Federal Rule of Civil Procedure
19 33(d).
20

21 15. For each person identified in response to Interrogatory No. 14, state whether
22 YOU ever EMPLOYED the person to perform work in California OFF THE BOOKS.

23 **RESPONSE:** Pasand is unable to answer this question without information from owners who
24 have plead the Fifth Amendment upon advice from their counsel.
25

26 16. For each of the PLAINTIFFS, IDENTIFY every person and ENTITY that
27 EMPLOYED the PLAINTIFF to perform work in California prior to January 1, 2000 and
28 provide the dates of EMPLOYMENT.

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RESPONSE:

1. DOE I often socialized at restaurant defendant Pasand Madras Cuisine, but never was employed by any defendant.
2. DOE II often socialized at restaurant defendant Pasand Madras Cuisine, but never was employed by any defendant.
3. DOE III Worked for various restaurants owned by defendants including Pasand Madras Cuisine, as well as being employed by Jay Construction from 1995 until the end of 1999.
4. DOE IV Worked for Jay Construction from 1995 until 1999. (See Produced ledgers) Was paid by Active Tech Solutions, but never performed any actual work for Active Tech Solutions.
5. DOE V Worked for Jay Construction from 1995 until 1999.
6. DOE VI Worked for Jay Construction from 1995 until 1999.
7. DOE VII was never employed by a defendant.
8. DOE VIII worked for Pasand Madras Cuisine from September of 1999 until January of 2000.
9. SREEKANTH KOLLIPARA came to the United States in December of 1999 to work for Active Tech Solutions, but never worked for Active Tech Solutions.
10. CHANTI JYOSTHNA DEVI PRATTIPATI often socialized at restaurant Pasand Madras Cuisine, but never was employed by any defendant.

Dated: March 17, 2015

BISHOP, BARRY, HOWE, HANEY & RYDER

By: MICHAEL W BOLECHOWSKI
MARK C. RASKOFF


VERIFICATION

RESPONSES TO PLAINTIFF'S INTERROGATORIES TO PASAND MADRAS CUISINE

- ☐ I, Lakireddy Bali Reddy, am a party to this action; the attached document is true of my own knowledge, except as to the matters that are stated there upon my information and belief or as to matters within the knowledge of my counsel of record or their agents, and as to those matters I believe them to be true.
- ☒ I am an officer or agent of the party providing this Verification, and am authorized to make this Verification for and on its behalf, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.
- ☐ I am one of the general partners of the partnership providing this Verification, and am authorized to make this Verification for and on behalf of the partnership, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.
- ☐ I am one of the attorneys for the party required to provide this verified Answer; I make this Verification on behalf of said party who is absent from the County of Alameda, California, where I have my office; I have read the attached Answer and know its contents; I am informed and believe and on that ground allege that the matters stated in it are true.
- ☐ I am one of the attorneys for the party required to provide this verified response. I make this Verification for the reason checked below:
- ☐ because the facts alleged in the attached document are within my own personal knowledge, and are not within the knowledge of the responding party or any of its agents or employees;
- ☐ because the responding party's whereabouts are unknown to me, said party has failed to communicate with me concerning the subject litigation, and it is impossible, impractical or futile to secure said party's Verification to the attached document;

The matters stated in the attached document are true of my own knowledge, except as to any matters stated therein upon information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on 3-13, 2003 at Lompoc, California.


Lakireddy Bali Reddy

MICHAEL W. BOLECHOWSKI (SBN: 118725)
 MARK C. RASKOFF (SBN: 72330)
 DAVID L. HART (SBN: 219517)
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 Attorneys for all Defendants except Prasad Lakireddy

IN THE UNITED STATES DISTRICT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

Case No. C-02-5570-WHA

**SUPPLEMENTAL RESPONSES TO
 PLAINTIFF JANE DOE I'S
 INTERROGATORIES TO PASAND
 MADRAS CUISINE**

JANE DOE I; JANE DOE II; LAKSHMI
 and JARMANTI PRATTIPATI as Parents
 and Successors in Interest of CHANTI
 JYOTSNA DEVI PRATTIPATTI; JANE
 DOE III; JANE DOE IV; JANE DOE V;
 DANE DOE VI; JANE DOE VII; JANE
 DOE VIII; SREEKANTH KOLLIPARA;
 and All Others Similarly Situated

Plaintiffs,

vs.

LAKIREDDY BALI REDDY, an
 individual; VIJAY KUMAR
 LAKIREDDY, an individual; PRASAD
 LAKIREDDY, an individual;
 JAYAPRAKASH REDDY LAKIREDDY,
 an individual; VENKATESWARA
 REDDY LAKIREDDY, an individual; and
 the businesses they controlled and/or
 operated, including PASAND MADRAS
 CUISINE, a California corporation;
 PASAND, INC., a California corporation;
 LAKIREDDY INVESTMENT CO., a
 California limited liability corporation; L.B.
 REDDY ESTATE CO., a California limited
 liability company; JAY CONSTRUCTION,
 a California sole proprietorship; ACTIVE
 TECH SOLUTIONS, a California
 corporation; VANI COMPUTER
 SOLUTIONS, a California limited liability
 corporation; LAKIREDDY BALI REDDY
 d/b/a REDDY REALTY CO., a California
 sole proprietorship; and ROES 1 through
 100, inclusive,

Defendants.

1
 SUPPLEMENTAL RESPONSES TO PLAINTIFF JANE DOE I'S INTERROGATORIES TO PASAND MADRAS
 CUISINE
 C-02-5570-WHA

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1 PROPOUNDING PARTY: PLAINTIFF JANE DOE I

2 RESPONDING PARTY: PASAND MADRAS CUISINE

3 SET NUMBER: ONE

4
5 SUPPLEMENTAL INTERROGATORIES RESPONSES

6 3. State YOUR legal status (i.e. corporation, partnership, joint venture, (unincorporated
7 association, etc.) and the place and date YOU were formed.

8 **RESPONSE:** In 1975 Defendant Lakireddy Bali Reddy opened the restaurant Pasand Bombay
9 Curries in Emeryville, Ca. On September 15, 1979 a branch of this restaurant was opened in
10 Berkeley, California. Between 1979 and the present the restaurant has become Pasand Madras
11 Cuisine. The restaurant has undergone changes in ownership and management after 1979. The
12 exact date it became Pasand Madras Cuisine is unknown. The previous answer that the restaurant
13 was formed sometime in the eighties was accurate and reflects the Defendants inability to
14 remember the exact date the restaurant was formed. For all intents and purposes the restaurant
15 was formed on September 15, 1979.

16
17 4. IDENTIFY every person and ENTITY that has an ownership interest in YOU
18 and state the size of that interest (i.e. 100 percent, 25 percent, etc.) (If there have been any
19 changes in ownership since January 1, 1990, describe each change in ownership.)

20 **RESPONSE:** Lakireddy Bali Reddy 2%, Prasad Lakireddy, Jay Lakireddy and Vijay Kumar
21 Lakireddy each has 32%. Previously Venkatswara Lakireddy had approximately a 25% interest.

22
23 6. IDENTIFY YOUR ORGANIZATIONAL DOCUMENTS.

24 **RESPONSE:** Defendants have made a diligent search, but have been unable to find
25 organizational documents. Defendants have made all records available to plaintiffs.

26
27 9. If YOUR answer to Interrogatory No.8 is yes, list the PLAINTIFFS whom you
28 EMPLOYED to perform work in California and provide their respective dates of

1 EMPLOYMENT.

2 **RESPONSE:** See response to interrogatory 16.

3
4 10. For each of the PLAINTIFFS listed in response to Interrogatory No.9,
5 IDENTIFY all DOCUMENTS that report the number of hours worked by the PLAINTIFF as
6 YOUR EMPLOYEE in California and/or the WAGES paid to PLAINTIFF for such work.

7 **RESPONSE:** HR 00001-HR01310 and HR 1549-2270

8
9 11. For each of the PLAINTIFFS listed in response to Interrogatory No.9, state
10 whether YOU ever EMPLOYED the PLAINTIFF to perform work in California OFF THE
11 BOOKS.

12 **RESPONSE:** All defendants who can answer this question have pled the 5th Amendment. All
13 employees who could answer this question have pled the 5th amendment.

14
15 12. For each of the PLAINTIFFS listed in response to Interrogatory No.9, provide a
16 complete itemization of all money and other things of value that were provided to the
17 PLAINTIFF (or his or her family) as full or partial compensation for the PLAINTIFF'S labor as
18 YOUR employee in California and that are not reported in the records YOU identified in
19 response to Interrogatory No.10.

20 **RESPONSE:** As agreed in the meet and confer Defendants will provide a list of all items of
21 value provided to all plaintiffs even though Defendant contends that many plaintiffs were not
22 employees.

23 A. Doe I received one-third of an apartment valued at \$1,200. Doe I received
24 furniture for her apartment. The apartment was located 2020 Bancroft #228
25 Berkeley, Ca. Doe I received plane tickets to visit India valued at \$2,000. Doe I
26 had and estimated \$2,000 paid towards medical expanses. Doe I received an
27 estimated \$2,000 for spending money. Defendant Lakireddy Bali Reddy would
28 take Doe I shopping and buy her whatever she asked for. Doe I received three

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- 1 meals a day with a total value estimated at \$20.00.
- 2 B. Doe II received one-third of an apartment valued at \$1,200. Doe II received
- 3 furniture for her apartment. The apartment was located 2020 Bancroft #228
- 4 Berkeley, Ca. Doe II received plane tickets to visit India valued at \$2,000.
- 5 Defendant Lakireddy Bali Reddy would take Doe II shopping and buy her
- 6 whatever she asked for. Doe II received three meals a day with a total value
- 7 estimated at \$20.00.
- 8 C. Chanti received one-third of an apartment valued at \$1,200. Doe I received
- 9 furniture for her apartment. The apartment was located 2020 Bancroft #228
- 10 Berkeley, Ca. Chanti received an estimated \$2,000 for spending money.
- 11 Defendant Lakireddy Bali Reddy would take Chanti shopping and buy her
- 12 whatever she asked for. Chanti received three meals a day with a total value
- 13 estimated at \$20.00.
- 14 D. Doe III received one-third of an apartment valued at \$1,200. Doe III received
- 15 furniture for her apartment. Doe III received \$1,300 a month in addition to room
- 16 and board. Doe I received plane tickets to visit India valued at \$2,000. Doe III
- 17 received I three tickets to India valued at \$1,500 each. Doe III received three meals
- 18 a day with a total value estimated at \$20.00. Defendants also built Doe III a home
- 19 in India.
- 20 E. Doe IV received one-third of an apartment valued at \$1,200. Doe IV received
- 21 furniture for her apartment. Doe IV received plane tickets to visit India valued at
- 22 \$2,000. Doe III received three meals a day with a total value estimated at \$20.00.
- 23 Defendants also built Doe III a home in India. When she started Doe IV was given
- 24 \$500 a month. When she quit she was being paid \$1,000 a month. Lakireddy Bali
- 25 Reddy paid for the wedding of the sister Doe IV in India, including the dowry.
- 26 Doe IV received three meals a day with a total value estimated at \$20.00.
- 27 F. Doe V received one-third of an apartment valued at \$1,200 located at 2126
- 28 Bancroft. Doe V received furniture for her apartment. Doe V received three

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meals a day with a total value estimated at \$20.00. When she started Doe V was given \$500 a month. When she quit she was being paid \$1,000 a month. Defendants paid hospital bills to Highland Hospital on behalf of Doe V in excess of \$1,000.

G. Doe VI received one-third of an apartment valued at \$1,200 located at 2126 Bancroft. Doe VI later received a studio apartment valued at \$600 a month located 2121 Channing in Berkeley, Ca. Doe VI received furniture for her apartment. Doe VI received three meals a day with a total value estimated at \$20.00. When she started Doe VI was given \$500 a month. When she quit she was being paid \$1,000 a month. Defendants paid \$10,000 towards Doe VI's marriage and dowry. Defendants paid for Doe VI to fly to India twice with tickets valued at \$1,500 each.

H. Doe VII was taken in by Vijay Lakireddy after being abandoned by her husband. Vijay Lakireddy allowed Doe VII to have access to computers to help her train to become a computer consultant. Doe VII was fed and treated like a guest.

I. Doe VIII received one-half of an apartment valued at \$1,000 located at 1915 Haste Street in Berkeley, Ca. Doe VIII received three meals a day with a total value estimated at \$20.00. When she quit she was being paid \$1,000 a month.

J. Sreekanth Kollipara received one-half of an apartment valued at \$1,200. Sreekanth received three meals a day with a total value estimated at \$20.00. Sreekanth was given access to computers with software to train him to become more marketable to help him find gainful employment. Sreekanth never performed any work for Active Tech. Active Tech never made any money from work performed by Sreekanth.

13. For each of the PLAINTIFFS listed in response to Interrogatory No. 9, provide a complete listing of the hours worked by the PLAINTIFF as YOUR employee in California that are not reported in the records YOU identified in response to Interrogatory No.10.

RESPONSE: Plaintiff worked on an "as needed" basis for Defendants while they were in the United States. Defendants are only able to give the specific information as contained in interrogatory response 16.

14. IDENTIFY every person (other than the PLAINTIFFS) whom YOU EMPLOYED to perform work in California at any time between January 1, 1990 and the present and provide their respective dates of EMPLOYMENT.

RESPONSE: The Defendants have provided the documents that contain the name of all Pasand Madras employees that are batesmarked HR 00001- HR 01310 and HR 1549 - HR 2270. In addition the Defendants provide the following list of employees and former employees after 1990 that is produced from memory of Defendants.

NAME	STATUS	ADDRESS
Ayyapa Reddy Seelam	Present	Berkeley, CA
Mrs. Annapurna Seelam	Present	Berkeley, CA
Sreenivasa Rao Thota	Present	Berkeley, CA
Mrs. Thota	Present	Berkeley, CA
Sivaram Reddy Tamma	Present	Berkeley, CA
Mrs. Tamma	Present	Berkeley, CA
Mrs. Lakshmi Yanduri	Present	Berkeley, CA
Venkat Yaramala	Present	Berkeley, CA
Mrs. Usha Yaramala	Present	Berkeley, CA
Venkateswara R. Yaramala	Present	Berkeley, CA
Ramkrishna R. Yaramala	Present	Berkeley, CA
Vara Prasad R. Tallapareddy	Present	Berkeley, CA
Sivaram Krishna R. Kidumula	Present	Berkeley, CA
Srinivasa Rao Vellanki	Present	Berkeley, CA
Koteswara Rao Lella	Present	Berkeley, CA
Rajasekhar Reddy Mukkara	Present	Berkeley, CA
Krishna Reddy Lakireddy	Present	Berkeley, CA
Ramachandra Reddy Seelam	Present	Berkeley, CA
Annapurna Eduru	Present	Berkeley, CA
Pullareddy Lakireddy	Left	Unknown
Mrs. Lakireddy	Left	Unknown
Mrs. Sovamma Garlapati	Left	Unknown
Mrs. Kittamma Kommineni	Left	Unknown
Ramu Lakireddy	Left	Unknown
Krishna Reddy Lakireddy	Left	Unknown
Ganesh Bolagani	Left	Unknown

1	Mrs. Bolagani	Left	Unknown
2	Pullareddy Lakireddy (China)	Left	Texas
3	Mrs. Lakireddy	Left	Texas
4	Ramana Kommineni	Left	Unknown
5	Mutha Reddy Guduru	Left	Oregon
6	Mrs. Guduru	Left	Oregon
7	Satyam Reddy Guduru	Left	Berkeley
8	Aruna Guduru	Left	Berkeley
9	Thirumala Reddy Yaramala	Left	Unknown
10	Mrs. Yaramala	Left	Unknown
11	Gayathri Kommineni	Left	Unknown
12	Krishna Rao Chattu	Present	Santa Clara
13	Srinivasa Rao Tadepu	Present	Santa Clara
14	Venkateswa Reddy Vemireddy	Left	Unknown
15	Nagaraju Prattipati	Left	Unknown
16	Jhansi Paragati	Left	India
17	Koteswaramma Tallapareddy	Left	India
18	Sujatha Velvadapu	Left	India
19	Krishna Murty Velvadapu	Left	Unknown
20	Krishna Reddy Yaramala	Left	Unknown
21	Mrs. Yaramala	Left	Unknown
22	Pakeera Reddy Guduru	Left	Unknown
23	Murali Mallu	Left	Unknown
24	Mrs. Mallu	Left	Unknown
25	Venkaja Reddy Vemireddy	Left	Texas
26	Mrs. Vemireddy	Left	Texas
27	Steve Patterson	Present	Berkeley

15. For each person identified in response to Interrogatory No. 14, state whether
YOU ever EMPLOYED the person to perform work in California OFF THE BOOKS.

RESPONSE: All defendants who can answer this question have pled the 5th Amendment.
All employees who could answer this question have pled the 5th Amendment.

16. For each of the plaintiffs, IDENTIFY every person and ENTITY that
EMPLOYED the PLAINTIFF to perform work in California prior to January 1, 2000 and
provide the dates of EMPLOYMENT.

RESPONSE:

1. DOE I often socialized at restaurant Pasand Madras Cuisine, but never was

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- 1 employed by any defendant. Defendants don't know anyone else that employed
2 this plaintiff.
- 3 2. DOE II often socialized at restaurant Pasand Madras Cuisine, but never was
4 employed by any defendant. Defendants don't know anyone else that employed
5 this plaintiff.
- 6 3. DOE III worked for various restaurants owned by Defendants on an "as needed
7 basis" and was employed by Jay Construction from 1995 until the end of 1999 as
8 well on an "as needed basis". Defendants can not be more specific with regard to
9 the hours Doe III worked. Defendants did pay for several trips to India for Doe III
10 for months. During the vacations to India Doe III performed no work for
11 Defendants. Defendants don't know anyone else that employed this plaintiff.
- 12 4. DOE IV worked for Jay Construction from 1995 until 1999. Doe IV was paid by
13 Active Tech Solutions but never performed any actual work for Active Tech
14 Solutions. Defendants have searched records and are unable to determine the
15 hours this plaintiff worked per week. Defendants paid for Doe IV to take trips
16 back to India for several months at a time. Defendants believe Doe IV worked at
17 Subway Sandwiches in Berkeley. Defendants have made a diligent search, but are
18 unable to give more specific information. Defendants don't know anyone else that
19 employed this plaintiff.
- 20 5. DOE V worked for Jay Construction from 1995 until 1999. Defendants paid for
21 Doe V to take trips back to India for several months at a time. Defendants have
22 searched records and are unable to determine the hours the plaintiff worked per
23 week. Defendants don't know anyone else that employed this plaintiff.
- 24 6. DOE VI worked for Jay Construction from 1995 until 1999. Defendants paid for
25 Doe VI to take trips back to India for several months at a time. Defendants have
26 made a diligent search of the records but are unable to give specific information on
27 the hours this plaintiff worked. Defendants don't know anyone else that employed
28 this plaintiff.

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7. DOE VII was never employed by a Defendant. Defendants don't know anyone else that employed this plaintiff.
8. DOE VIII worked for Pasand Madras Cuisine from September of 1999 until January of 2000. Defendants can not be more specific concerning the hours she worked. Defendants are not aware of Doe VIII's other employers.
9. SREEKANTH KOLLIPARA came to the United States in December of 1999 to work for Active Tech Solutions but never worked for Active Tech Solutions. Defendants don't know anyone else that employed this plaintiff.
10. CHANTIYOSTHNA DEVI PRATTIPATI often socialized at restaurant Pasand Madras Cuisine, but never was employed by any defendant. Defendants don't know anyone else that employed this plaintiff.

Dated: 5-27-03

BISHOP, BARRY, HOWE, HANEY & RYDER

By: 

MICHAEL W BOLECHOWSKI
MARK C. RASKOFF
DAVID L. HART

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PROOF OF SERVICE

I am a citizen of the United States and employed in the County of Alameda, City of Emeryville, California. I am over the age of eighteen years and not a party to the within action. My business address is Bishop, Barry, Howe, Haney & Ryder, P.C., 2000 Powell Street, Suite 1425, Emeryville, California 94608. I am familiar with Bishop, Barry, Howe, Haney & Ryder's practice whereby each document is placed in an envelope, the envelope is sealed, the appropriate postage is placed thereon, and the sealed envelope is placed in the office mail receptacle. Each day the mail is collected and deposited in a United States Postal mailbox at or before the closed of business each day.

On the date below-written, I served the following document(s):

SUPPLEMENTAL RESPONSES TO PLAINTIFF JANE DOE'S INTERROGATORIES TO PASAND MADRAS CUISINE

☒ By placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the designated area for outgoing mail at Emeryville, California, addressed as set forth below:

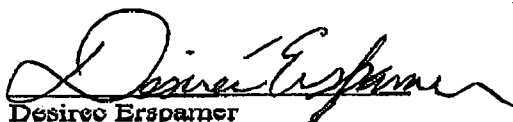
Michael Rubin, Esq. Scott A. Kronland Rebekah B. Evenson Altshuler, Berzon, Nussbaum, Rubin & Demain 177 Post Street, Suite 300 San Francisco, California 94108	Attorneys for Plaintiffs Telephone: 415-421-7151 Facsimile: 415-362-8064
Jonathan R. Bass Coblentz, Patch, Duffy & Bass LLP 222 Kearny Street, Seventh Floor San Francisco, California 94108-4510	Attorneys for Defendant Prasad Lakireddy Telephone: 415-391-4800 Facsimile: 415-989-1663

☐ By having a messenger personally deliver a true copy thereof to the person and/or office of the person at the address set forth below:

☐ By delivering a true copy thereof to (check service used) ___ U.S. Postal Express Mail; ___ UPS Overnight Mail; ___ Federal Express Overnight Service to be delivered to the person at the address set forth below:

☒ By transmitting, pursuant to C.R.C. Rule 2008, a true copy thereof via facsimile transmission to the facsimile telephone number referenced at the address set forth below. The transmission was reported as complete and without error and a copy of the transmission report, which was properly issued by the transmitting facsimile machine, is attached hereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on Executed on May 23, 2003, at Emeryville, California.


Desiree Erspamer